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June 15, 1994

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Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: Testimony of The Walt Disney Company  
for the En banc Hearing in the  
Matter of Policies and Rules  
Concerning Children's Programming,  
MM Docket No. 93-48

Dear Mr. Caton:

I attach an original and nine copies of the  
Testimony of The Walt Disney Company to be presented by  
Kenneth D. Werner and Bill Nye at the En Banc Hearing  
scheduled for June 28, 1994, in the Matter of Policies and  
Rules Concerning Children's Television Programming, MM  
Docket No. 93-48.

If you have any questions or require any additional  
information, please do not hesitate to call.

Sincerely,

  
Diane S. Killory

Counsel for  
The Walt Disney Company

Attachments

cc: Larry Miller

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**Testimony**  
**of**  
**The Walt Disney Company**  
**presented by**

RECEIVED

JUN 15 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF GENERAL COUNSEL

**Kenneth D. Werner**  
**Senior Vice President of Business Affairs**  
**Walt Disney Television**

**and**

**Bill Nye**  
**Creator and Host**  
***Disney Presents: Bill Nye the Science Guy***

**The Federal Communications Commission**  
**Washington, D.C.**  
***En banc* Hearing**  
**June 28, 1994**

**MM Docket No. 93-48**

**SUMMARY**  
**of**  
**Testimony of The Walt Disney Company**  
**Presented by Kenneth D. Werner and Bill Nye**

For more than half a century, the Walt Disney Company has had a commitment to the production of high quality children's programming. In all those years of experience, Disney has developed one basic tenet: children will watch quality programs that are entertaining.

We are here today because the Commission's proposed definition of educational programming flies directly in the face of that lesson. To require that qualifying educational or informational programs have education as *the primary purpose* and that the entertainment component -- the creative element -- be relegated to secondary status, will result in an inferior product that children will not watch. Because children can't learn from programs they don't watch, the Commission's proposal will unwittingly frustrate the purpose of the Children's Television Act.

Disney's award-winning children's program *Disney Presents: Bill Nye the Science Guy* illustrates this point. *Bill Nye* is designed to educate children in an entertaining way. For example, through MTV-type music videos with scientific lyrics, unusual graphics, special effects and comedy, *Bill Nye* teaches children sophisticated scientific concepts in an engaging and interesting manner.

Is *the primary purpose* of *Bill Nye* education? Is entertainment only a *secondary purpose*? Clearly not. The program is highly entertaining, which is why

children watch and learn. Unfortunately, because the program is highly entertaining, it might not qualify as educational or informational under the Commission's proposed definition. The problem with the Commission's definition is obvious. Instead of encouraging creative educational programs that will capture children's attention and assist in the learning process, the Commission's proposal will create an incentive for broadcasters to air programs that are pedantic and less entertaining. But if educational programs are anything short of fully entertaining and engaging, children simply will not watch.

Disney therefore urges the Commission to abandon its definition and proposes that educational programming be defined as programming that has education as *a significant purpose*. This approach will provide producers with sufficient latitude to create the best possible programming -- programming that educates while it entertains.

## TESTIMONY OF KENNETH D. WERNER

Good Afternoon, my name is Ken Werner. I am Senior Vice President of Walt Disney Television and am here today with Bill Nye, the creator, writer and star of *Disney Presents: Bill Nye the Science Guy*.

I note, preliminarily, that Disney has filed comments addressing many of the issues the Commission focuses on today. We attach a copy of our prior comments for your convenience.

The Walt Disney Company has had a long and distinguished history of producing children's programming and based on that accumulated experience, our answer to the question "Educational and informational programming: will we know it when we see it?" is a resounding *MAYBE!* It all depends on the rules you adopt.

We are here today, as members of the creative community, because we are very concerned about the unintended consequences that could result if the Commission adopts the definition of "educational programming" proposed in The Notice of Proposed Rulemaking. Specifically, the Commission should discard the proposal that would require that *the primary purpose* of a program be educational with entertainment being permitted only secondary status.

Bill Nye is with us today. His award-winning program, *Disney Presents: Bill Nye the Science Guy*, teaches fairly sophisticated scientific concepts to children in a manner that they

can understand; even I can understand. And, more importantly, the kids like it. I've asked Bill to give us a creator's opinion on successful educational programming.

\*

\*

\*

## **TESTIMONY OF BILL NYE**

My name is Bill Nye.

I'm a mechanical engineer. I worked in aerospace for ten years.

I studied with Carl Sagan, taught science to children in public schools, and have appeared on *Regis and Kathie Lee* and on *Late Nite with David Letterman*.

I believe I qualify as an entertaining educator. So that's why we're here:  
Encouraging entertaining, educational children's television programming.

It all starts with the show. If a program is not entertaining and enjoyable to children, they won't watch.

The challenge is to convey information in a fashion that will capture a child's attention and imagination.

Let's take the subject of science. I love science. I love teaching science. And I believe there is nothing more interesting to children than science. It's about how their world works.

More often than not, if a child is not interested in science, it is due to the manner in which it is taught rather than a child's lack of interest.

Our goal with *Disney Presents: Bill Nye the Science Guy* is to present scientific information in a manner that will engage children and capture their attention. To do so, we must engage their minds in a fun, exciting, enjoyable, and *entertaining* way.

For example, we use MTV-type music videos with scientific lyrics, unusual graphics, special effects and comedy to illustrate scientific principles.

Someone recently asked me to break down into percentages the entertainment and educational components of our show. Quite honestly, I couldn't do it. But I am 100 percent certain that the program is more than 50 percent entertainment -- or kids wouldn't watch. But they do watch -- because we have created an entertaining program that provides interesting scientific information.

Holding people's interest while educating them is not easily separated from entertaining them. An educational children's program cannot be broken down into component parts -- and it would be a grave mistake, in my view, to try to do so. We've brought along a short clip to give you an idea of what we are talking about.

\*

\*

\*

**VIDEO CLIP FROM *DISNEY PRESENTS: BILL NYE THE SCIENCE GUY***

\*

\*

\*

## CONTINUED TESTIMONY OF KENNETH D. WERNER

You've just seen an example of an award-winning, educational children's program -- a program that I humbly submit epitomizes the very best of educational children's programming. But even *Bill Nye* might flunk the Commission's proposed definition of educational programming because entertainment is obviously an important objective. Indeed, that is precisely *why* the show works -- it educates in an entertaining way.

We at The Walt Disney Company pride ourselves on producing quality programming for children. Whether it's a feature film or a television program, we always strive to create programming of a superior nature. In the children's television educational market we are proud to produce not only *Bill Nye*, but also the award-winning *Adventures in Wonderland*.

We believe one of the reasons for our success is that we always start with the creative. Does the program work creatively? Is it compelling? Engaging? Entertaining? If the answers are yes, then we know we may have something. That lesson has stood Disney well for more than 50 years.

The Commission's proposed rule flies directly in the face of that lesson -- requiring the creative component -- the entertainment value -- to be relegated to second class status. The result, we submit, will be an inferior product that children will not watch. And the Commission will have foiled, however unwittingly, the objective of the Children's Television Act.

That Act's goal was to have broadcasting assist and supplement the traditional educational process -- not replace it -- through programming that improves the intellectual

processes of children. While children may be a captive audience of the school system, they are not so when it comes to television. Outside of school, children make enormous numbers of choices each day as to how to spend their free time. In the video world alone, whether it's a 5 channel, 50 channel or 500 channel world, choices abound that are only expanded by video games and computers. If the Commission adopts regulations that encourage educational programs that are anything short of fully entertaining and engaging, children will simply choose not to watch. Therefore, to assist in the learning process, through television, the product we produce *MUST* stand on its own as interesting, engaging, entertainment.

Walt Disney once said, "We have long held that the normal gap between what is generally regarded as entertainment and what is defined as education represents an old and untenable viewpoint."

Walt had it right. The Walt Disney Company, therefore, strongly urges the Commission to jettison its proposal and instead adopt rules that provide producers with sufficient latitude to create the best possible programming. Specifically, we continue to propose that educational programming be defined as programming that has education as *a significant purpose*.

In other words, to answer the question posed to this panel: with our definition, you will know educational programming when we see it!

## **BIOGRAPHY OF KENNETH D. WERNER**

For over five and one-half years Kenneth D. Werner has been employed by The Walt Disney Company most recently as Senior Vice President of Business Affairs for Walt Disney Television. Mr. Werner is responsible for the business and legal affairs relating to domestic television syndication for Walt Disney Television and Buena Vista Television product, including first-run, basic cable and off-network programming and various other special studio projects, including Disney's Washington based efforts involving children's television issues.

Mr. Werner joined Disney in 1988 after serving as Senior Vice President, Business Affairs at Columbia/Embassy Television. Prior to that, Mr. Werner was a business affairs executive at Viacom Enterprises for 4 1/2 years.

Mr. Werner began his career in the business side of entertainment as an attorney and Assistant Executive Director of The Dramatists Guild, Inc., the professional association of persons writing for the theater. Mr. Werner is a member of the New York State Bar and a graduate of New York Law School and Georgetown University. He has lectured extensively on entertainment at business schools, law schools and symposia throughout the country.

## **BILL NYE Science Guy®**

### **BIO:**

The host of "Disney Presents Bill Nye the Science Guy." He has combined his skills as a scientist and entertainer to make a science show for kids (of all ages). Bill has twelve Emmys and the show has won the National Education Association Award for Outstanding Children's Programming.

After 10 years of "layin' lead" on engineering drawing boards, Bill Nye gave in to his wild side; he started writing and performing comedy on television. One thing led to another, and he became "Bill Nye the Science Guy."

He produced and performed regular segments on the "Back to the Future" Cartoon Show, the new "Mickey Mouse Club," and he appeared on "Late Night with David Letterman" in March before developing his own show-- all about science all the time. And, it's funny. His book Science Party was published in the fall of 1993. It's written to make you want to read about science. He's known for his unusual eye-catching science demonstrations and weekly radio shows, where he pointed out, "It's all done with molecules."

Nye studied at Cornell University under Carl Sagan, taught science with Mr. Wizard, is a member of the National and Washington State Science Teacher Associations, and is a licensed Professional Engineer. When it comes to science that's fun and funny, Bill Nye is the Science Guy.

### **Other Items:**

Regularly on National Public Radio's "Voice of Inquiry" produced by the Committee for the Scientific Investigation of Claims of the Paranormal (CSICOP). Isaac Asimov, Paul MacCready, and Carl Sagan are noted members.

As an engineer, Nye worked on the 747 hydraulic systems, ring laser gyros for business jets, a solid state micrometer capable of measuring 0.5 micrometer displacements, and an airplane instrument panel volume knob that's "coffee-proof."

Wrote "Ask Bill Nye the Science Guy" column in "Young American" newspaper for three years.

National Merit Scholar commendation for achievement in Physics.  
Dean's List, Senior Year.

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of

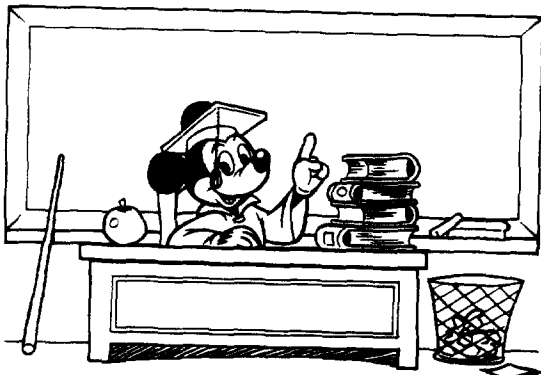
Policies and Rules Concerning  
Children's Television Programming

Revision of Programming Policies  
for Television Broadcast Stations

MM Docket No. 93-48

COMMENTS OF

THE **WALT DISNEY** COMPANY.®



© Disney

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May 7, 1993

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## SUMMARY

Bo may know baseball, but The Walt Disney Company knows children. Disney, after all, has been producing movies and television programs for children for more than a half century. The fundamental tenet Disney has learned over the years -- and the tenet that underlies all Disney productions -- is that children will watch quality programs that are entertaining. Children are, in fact, a discerning audience.

Just as children are more likely to watch what is entertaining, they are more likely to learn from what is entertaining. Walt Disney himself recognized this years ago, when he commented: "We have long held that the normal gap between what is generally regarded as 'entertainment' and what is defined as 'educational' represents an old and untenable viewpoint."

Educational experts agree. One need only examine modern educational theory to see that lectures and rote memorization have long since been replaced by teaching methods designed to entertain as well as educate. Today's students, for example, learn about physics from teachers that spin around like figure skaters. They learn math and hone their reading skills from computer games.

In short, children learn best when learning is fun. And what is true in the classroom is equally true on the television screen. Educational programs such as *Sesame Street* are successful because they both entertain *and* educate. Children watch *Sesame Street* because they have fun with their friends Big Bird and Cookie Monster. And, in the process of watching, they learn.

The problem that Congress has recently identified, and that the Commission now seeks to address, is *not* that some educational programs also are entertaining. Rather, the problem is that some broadcasters evidently are attempting to avoid their educational programming obligation by designating purely entertainment programs (*e.g.*, *The Flintstones*) as educational.

The Commission, quite properly, now seeks to redress this problem. In doing so, however, it must be careful not to lose sight of the goal of the Children's Television Act of 1990 -- educating children and encouraging them to learn. The Commission's proposal to require that *the primary* purpose of a program be educational, with the entertainment value relegated to secondary status, will unwittingly frustrate that goal. By requiring broadcasters to undertake the difficult task of ranking the educational and entertainment values of programs, the Commission will create an incentive for broadcasters to air programs that are more pedantic and less entertaining. The proposal is thus directly at odds with current educational theory that teaches that children learn best when they are having fun. More significantly, children will not watch -- and consequently will not learn from -- these programs.

In order to ensure that broadcasters meet their educational programming obligation without discouraging programs such as *Sesame Street* that both entertain and educate, the Commission should permit broadcasters to rely on a program if they make a reasonable, good faith judgment that *a significant* (as opposed to *the primary*) purpose of the program is educational. This approach will encourage broadcasters to air programs that are at least as entertaining as they are educational. At the same time, because it would be unreasonable for broadcasters to conclude that a significant purpose of a purely entertainment program like

*GI Joe* is educational, it will prevent broadcasters from avoiding their educational programming obligation. In short, such an approach will further rather than frustrate Congress' goal in enacting the Act.

Commissioner Duggan recently expressed his hope for "a vigorous, voluntary response from broadcasters and program producers" in providing more educational programming. Disney is a producer that stands ready and willing to produce educational children's programming. All we ask is that the Commission not create a regulatory regime that stifles our ability to do what we do best -- create and produce quality children's programming that will teach children by engaging them in an entertaining manner.

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of	)	
	)	
Policies and Rules Concerning	)	MM Docket No. 93-48
Children's Television Programming	)	
	)	
Revision of Programming Policies	)	
for Television Broadcast Stations	)	

To: The Commission

**COMMENTS OF  
THE WALT DISNEY COMPANY**

The Walt Disney Company ("Disney"), by its attorneys, submits these comments in response to the Commission's Notice of Inquiry in the above-captioned proceeding.

**INTRODUCTION**

In enacting the Children's Television Act of 1990, 47 U.S.C. § 303a and § 303b (the "Act"), Congress required broadcasters to air programs that meet the informational and educational needs of children. Television, Congress stated, is particularly well-suited to help teach children "while entertaining them and exciting their curiosity to learn."<sup>1</sup>

Congress thus recognized the fundamental precept upon which today's educational system is based: Children learn best when they are engaged -- *i.e.*, when learning is fun.

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<sup>1</sup> 47 U.S.C. § 303a (Supp. II 1990).

What is true in the classroom is equally true on the television screen. Simply put, children will watch programming only if it engages them in an entertaining manner. And they obviously cannot learn from programming they do not watch.

The Commission threatens to frustrate the very purpose of the Act -- educating our children -- by proposing to recognize only those educational programs whose entertainment value is relegated to secondary status. Far from discouraging the entertainment value of this kind of programming, the Commission should be encouraging educational programming that is also entertaining.

The Commission's proposal also risks stifling the creative freedom of broadcasters and producers. Disney is a producer that prides itself on understanding children. Disney's success in producing children's movies and television programs is premised on the same principle that Congress recognized in adopting the Act -- children will watch quality programs that are entertaining, not those that are pedantic and dull.

When Disney entered the first-run children's programming market in 1987, it changed the face of children's entertainment programming. Prior to 1987, there was a dearth of quality children's programming. Children's programs were predominantly based on toys that appealed to either boys or girls (but not both), had unsophisticated story lines, and lacked fully developed characters. Applying its bedrock philosophy to television programming, Disney created a different kind of children's programs -- quality programs that were character/story-based, appealed to both boys and girls, and had well-rounded story lines that featured fully developed characters.

Children reacted positively, with the new Disney programs gaining unprecedented viewership.<sup>2</sup> Other producers followed Disney's lead, and children's programming soon shifted from toy-based to higher quality, character/story-based programs. Children are, in fact, a discerning audience that will gravitate to quality programs.

The status of the market today with respect to children's educational programming is not unlike the market for children's entertainment programming before 1987. Few resources are devoted to the production of educational programming, which has to date largely been seen as uninteresting and therefore unlikely to attract many viewers. As a result, there is a dearth of quality educational programming currently available.

Disney is convinced, however, that children will watch educational programming if it is high quality and engaging in an entertaining manner. Disney is committed, therefore, to producing television programs that meet the educational and informational needs of children. But we will not compromise Disney's longstanding emphasis on quality programming that will attract children and hold their attention, by entertaining as well as educating them. In short, we will not spend our time and resources to produce programs that children will not watch.<sup>3</sup>

For these reasons, Disney urges the Commission not to adopt its proposal to require that in order for programming to qualify as educational and informational, its primary purpose must be to educate, with entertainment only a secondary purpose. Instead, so long as a

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2 A more detailed discussion of Disney's experience in producing children's television programs can be found in our Comments filed in Docket No. 90-570 (January 30, 1991) ("Disney Comments").

3 The cost of producing quality children's programs is substantial. When Disney entered the children's entertainment programming market in 1987, our programs' budgets were double those of typical children's programs. The educational programs Disney is producing for the 1993 fall season will require Disney to risk many millions of dollars. Taking such a risk will be problematic if we are constrained by a regulatory climate that makes it less likely that children will watch these programs.

broadcaster makes a reasonable, good faith judgment that education is *a significant* (as opposed to *the primary*) goal of a program, the program should be considered educational.

## **I. ENTERTAINMENT IS A CRITICAL COMPONENT OF THE EDUCATIONAL PROCESS**

The goal of the Act is to educate children -- the same goal of our educational system. The Commission need only consider how educational theory has evolved over the years to realize the importance of entertainment in the educational process.

Gone are the days when students had the "three R's" drummed into them by teachers standing at a blackboard. Educators have long since realized that rote memorization as a teaching method is not particularly successful, nor does it lead to long term understanding. Modern educational theory teaches that children learn best when learning is interesting and fun, so that children become engaged.<sup>4</sup> Research demonstrates that "being entertaining is strongly associated positively with teacher effectiveness."<sup>5</sup> Based on this research, three noted educational scholars conclude that:

[b]ecause students are best motivated by interesting topics taught in interesting ways by interesting instructors . . . educators would do well to embrace entertainment as a friend, not a foe, of effective instruction. When understood as a valuable mediation process for joining together our students and our subject matter, entertainment becomes an educational tool we *can* live with and *can't* live without.<sup>6</sup>

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4 Indeed, our own experiences validate this theory: Most of us remember the one teacher who made Shakespeare or physics or geography come alive by innovative teaching methods that captured our attention.

5 Russel F. Proctor II *et al.*, *Entertainment in the Classroom: Captivating Students Without Sacrificing Standards*, Educational Horizons, Spring 1992, at 147.

6 *Id.* at 151-52 (emphasis in original).

Nobel Prize laureate Leon Lederman assists teachers in translating this theory into reality. He founded Teachers Academy for Mathematics and Science, which teaches teachers how to make math and science interesting to students.<sup>7</sup> The Academy's aim is "the withering away of old-time droning lectures, deadly book lessons and rote memorization."<sup>8</sup> Lederman, for example, has taught students about conservation of angular momentum by stepping onto a turntable with a brick in each hand and spinning around like a figure skater.<sup>9</sup>

Today's educators combine such innovative teaching methods with a wide array of technology to make learning entertaining and fun, so that children *want* to learn. Virtually every child in America, for example, is introduced at a very early age to computers that engage the child in the learning process through software programs that both entertain and educate.

Entertainment is equally important in educational television programming. The most successful educational programs have been those like *Captain Kangaroo*, *Sesame Street*, and *Romper Room* that children watch primarily because they entertain. The entertainment value of these programs is therefore at least as important as their educational value. Thus, the Commission need only look at educational theory generally, and at successful educational television programming specifically, to see that children learn best when the learning process is entertaining.

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7 Richard Wolkomir, *Putting A New Spin On Pitching Science To Kids*, Smithsonian, April 1993, at 104.

8 *Id.* at 112.

9 *Id.* at 104.

**II. THE COMMISSION'S PROPOSAL TO REQUIRE THAT THE  
PRIMARY PURPOSE OF PROGRAMMING BE EDUCATIONAL,  
WITH ANY ENTERTAINMENT VALUE PURELY SECONDARY,  
WILL DISSERVE THE PUBLIC INTEREST**

Given how critical entertainment is to the educational process, the Commission's proposal to require that any entertainment value of educational programming be purely secondary will disserve the public interest. The Commission's proposal puts broadcasters to the almost impossible task of ranking the educational and entertainment purposes of a program. The Commission thus will create such a degree of uncertainty (at least with respect to programs that both educate and entertain) that broadcasters will have a strong incentive to air pedantic and dull, albeit primarily educational, programs to ensure that they have met their educational programming obligation.

The Commission's regulatory scheme will thus encourage programs that educational experts would agree are *less effective* in teaching children. The more fundamental problem, however, is that the Commission's proposal will result in educational programs that children will not watch. The government can force children to go to school, but it cannot force children to watch educational television programs. Children have proven themselves to be sophisticated consumers with an uncanny ability to get what they want. (Just ask any parent.) They are also technologically sophisticated to the point of surpassing many of their parents when it comes to the high-tech world of computers, VCRs and the like. Children are experts at using the remote control -- and they will use it to exercise their television viewing choices. In short, they will quickly exit any program that does not hold their attention.

Given this reality, the Commission should reconsider its current proposal, which will serve to frustrate rather than further the Act's goal of educating children. The

Commission would better serve the public interest by encouraging programming that is at least as entertaining as it is educational.

**A. The Commission's Proposal Will Frustrate The Purpose Of The Act By Unwittingly Encouraging Broadcasters To Air Programs That Children Will Not Watch**

In its Notice of Inquiry, the Commission states that "it seems clear that Congress intended, in adopting the [Act], to increase the amount of educational and informational programming aimed expressly at the child audience."<sup>10</sup> To be sure, the legislative history of the Act confirms the accuracy of the Commission's statement. That statement, however, tells only part of the story. Congress intended not only to increase the amount of educational programming on television, but also for children to watch and learn from that programming.<sup>11</sup>

Congress understood that programs can be both educational and entertaining. Noting that "the questions most asked concerning educational programming are whether children will watch," Congress approvingly cited programs like *Sesame Street*, *Fat Albert and the Cosby Kids*, and *Winnie the Pooh and Friends*.<sup>12</sup> All these programs both educate and entertain; and it takes both attributes to further the Act's goal.

The problem recently identified by Congress is not that some programs are designed both to educate and to entertain. The problem is that some broadcasters are attempting to avoid their educational programming obligation by designating purely entertainment programs

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<sup>10</sup> Policies and Rules Concerning Children's Television Programming, Notice of Inquiry, MM Docket No. 93-48, 8 FCC Rcd. 1841, 1842 (1993) ("Notice of Inquiry").

<sup>11</sup> See, e.g., S. Rep. No. 227, 101st Cong., 1st Sess. 5 (1989) ("Senate Report") ("Moreover, there is a great deal of evidence that television can teach children effectively.").

<sup>12</sup> Senate Report at 8-9.

(e.g., *The Flintstones*) as educational programs. The Commission, in ensuring that broadcasters meet their educational programming obligation under the Act, must be careful not to discourage the very type of programming lauded by Congress -- entertaining educational programming.

Disney respectfully submits that the Commission's proposal will, in fact, discourage this type of programming. The Commission proposes to require broadcasters to determine whether *the primary* purpose of a program is educational. The program's entertainment value, under the Commission's proposal, can only be *implicit*. Broadcasters will thus have to decide -- usually with respect to programs others have produced -- whether those programs are designed to teach more than they are designed to entertain. This will, however, be a difficult distinction for broadcasters to draw -- particularly for programs that are designed to capture children's attention in an entertaining manner.<sup>13</sup>

Consider, for example, the award-winning and ever-popular *Sesame Street*. The program clearly is both educational and entertaining. Could a broadcaster be sure that the Commission would find that *the primary* purpose of the program is to educate, and that its entertainment value is purely a secondary goal? Could a broadcaster be certain that entertainment is not an explicit purpose of *Sesame Street*? Parents, after all, know that their children tune in to *Sesame Street* because they want to have fun with their friends Ernie and Bert, not because they want a dose of education.

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<sup>13</sup> The proposal thus fails, contrary to the Commission's intent, to "exemplify and define the [Act's] programming requirements" in order to "better guide broadcasters in discharging their children's programming obligations." Notice of Inquiry at 1842.